

**THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

SHIBUMI SHADE, INC.

Plaintiff,

v.

GARDMA LLC d/b/a MILLION SHADES
AMERICA,

Defendant.

Civil Action No: 5:24-cv-00588-FL

**JOINT MOTION TO EXTEND DEADLINES REGARDING
DEFENDANT’S MOTION TO DISMISS**

Plaintiff Shibumi Shade, Inc (“Plaintiff”) and Defendant Gardma LLC d/b/a Million Shades America (“Defendant”), by and through the undersigned counsel respectfully jointly move this Court to extend the following Response and Reply deadlines regarding Defendant’s Motion to Dismiss. Dkt. 15.

	Current Deadline	Revised Deadline
Plaintiff’s Response	January 2, 2025	January 16, 2025
Defendant’s Reply	January 16, 2025	February 13, 2025

In further support of this Motion, the parties state as follows:

1. On December 12, 2024, Defendant filed a Motion to Dismiss Plaintiff Shibumi Shades, Inc.’s Complaint.
2. Plaintiff requested an extension to accommodate the upcoming holidays. Defendant agreed but also asked for an extension of its time to reply to accommodate other

commitments during that period. This motion is made in good faith and not for the purpose of delaying these proceedings.

3. Counsel for Plaintiff and Defendant conferred and agree on the above schedule.

WHEREFORE, the parties respectfully request that the Court grant this Motion and extend the Response and Reply deadlines as set forth above.

Dated: December 19, 2024

Respectfully submitted,

SHUMAKER, LOOP, & KENDRICK LLP

WOMBLE BOND DICKINSON (US) LLP

By: /s/ Samuel Alexander Long Jr.

/s/ Preston H. Heard

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CERTIFICATE OF SERVICE

The undersigned hereby confirms that on December 19, 2024, I electronically filed the foregoing with the Clerk of Court using CM/ECF system, which will send notifications of such filing to the counsel of record.

/s/ Preston H. Heard
Preston H. Heard